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**Sent:** Monday, November 22, 2010 5:11 PM

**To:** Groundwater Elevation Support

**Subject:** Comments Regarding CASGEM Procedures for Monitoring Entity Reporting

Good evening,

Please accept and consider the following comments regarding the CASGEM Procedures for Monitoring Entity Reporting.

### **Requirements to Become Monitoring Entity:**

"Management Area Technical Groups" formed as a stipulation from a Court judgment and "Management Groups" as defined by an Interlocutory Stipulated Judgment, should qualify as an entity that may assume responsibility for monitoring and reporting groundwater elevations as part of the CASGEM program.

### **Monitoring Sites and Timing:**

Please clarify how the Monitoring Plan shall demonstrate that the proposed monitoring is sufficient to represent groundwater level conditions in the monitored area.

Please clarify how the Monitoring Entities shall justify that there are enough points to draw accurate contour maps.

Please clarify how the Monitoring Entities shall justify that measurements are obtained frequent enough to develop accurate hydrographs for seasonal and long-term variability.

Please list the existing agreements (if any) between DWR and DPH which allow for the disclosure of the location of public water supply wells.

### **Data Reporting:**

Please clarify which data is considered as confidential and will not be made available to the public (excluding well logs).

The current naming procedure is unclear because the draft appears to allow for three different types of names: a name based on the agency, a groundwater basin, or a geographic feature. I recommend one naming structure for all wells in the CASGEM program.

The State already has a well naming system in place - the State Well Number – why

create a new naming protocol?

Creating new well designations or identification names for existing wells (which likely already have names) may confuse matters. (It may be difficult to reconcile databases obtained from different sources because one site may have two [or more] names.)

Please clarify the difference between “optional” and “recommended”. It appears that both “optional” and “recommended” indicate data that should be reported, if available.

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